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Chapter 7 Trustee for 1st Rochdale Cooperative
Group, Ltd.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 1/9/2008

In re:

1ST ROCHDALE COOPERATIVE GROUP, LTD.

Debtor

Bankruptcy Proceeding Chapter 7
Case No. 05-12086 (PCB)

ROBERT L. GELTZER, as Chapter 7 Trustee for
1ST ROCHDALE COOPERATIVE GROUP, LTD.,

Plaintiff,

v.

GARY ALTMAN, RHODA BROWN, "JOHN DOE
1" AS EXECUTOR OR ADMINISTRATOR OF
THE ESTATE OF GEORGE CRETHAN, SAUL
MILDWORM, JACK RASKIN, DAVID SMITH,
FRANCIS CONNOLLY and JOAN KRAMER AS
EXECUTORS OF THE ESTATE OF ALLEN
THURGOOD, EDWARD YAKER, GREGORY
WORTHAM and DAVID L. JOHNSON,

Defendants.

07 CV 7852 (DC)

STIPULATION AND ORDER EXTENDING TIME TO ANSWER
OR OTHERWISE RESPOND TO COMPLAINT

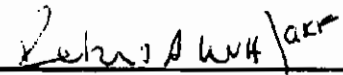
IT IS HERBY STIPULATED AND AGREED by and between the respective undersigned counsel for plaintiff Robert L. Geltzer, as Chapter 7 Trustee for 1st Rochdale Cooperative Group, Ltd. (the "Trustee"), and for defendants Francis Connolly and Joan Ramer as Executors of the Estate of Allen Thurgood (collectively "Defendants"), as follows:

1. The firm of Haynes Boone hereby appears in this adversary proceeding as attorneys for the Defendants and has accepted service of the Summons and Complaint served in the adversary proceeding.
2. The time for the Defendants to serve a response to the Trustee's Complaint in this adversary proceeding is extended through and including January 31, 2008.
3. The Defendants irrevocably waive their right to assert any defense in this adversary proceeding which is based upon (i) lack of service and/or improper service of process upon the Defendants; and/or (ii) lack of personal jurisdiction over the Defendants.

4. This Stipulation may be executed in one or more counterparts, each of which shall be deemed an original, but all of which shall constitute one and the same instrument. Moreover, signatures of the Stipulation sent by facsimile or electronic mail transmission shall be deemed the equivalent of original signatures.

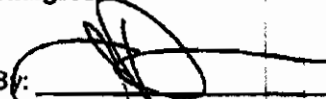
AGREED AND STIPULATED TO:

BRYAN CAVE LLP
Counsel for the Trustee

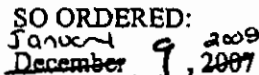
By: 
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SO ORDERED:

January 9, 2009
December 9, 2007
New York, New York


HONORABLE DENNY CHIN
UNITED STATES DISTRICT COURT JUDGE